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June 20, 2023

Via ECF

The Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: ***Ponce, et al v. Safi-G, Inc., et al***
Civil Docket No.: 22-cv-04341 (PGG)(SLC)

Dear Judge Gardephe:

We represent the Plaintiffs in this FLSA action, and we respectfully submit this letter motion, jointly with the counsel for the Defendants, to respectfully request an extension of time for the parties to file their Joint Pre Trial Order, and other trial-related submissions in accordance with Your Honor's rules.

On April 28, 2023, the parties apprised the Court that all discovery in this matter has been completed. *See* Dkt. No. 35.

Pursuant to Section X of Your Honor's rules, "[u]nless otherwise ordered by the Court, within 30 days from the date for the completion of discovery in a civil case. . . the parties shall submit to the Court for its approval a joint pretrial order..."

The reason the parties have not done so sooner, is that the parties have been actively engaged in good faith settlement discussions in anticipation of resolving this matter via settlement and in lieu of a trial. While the parties have been substantial process towards that end, they have not yet been able to do so.

Notwithstanding, the parties reasonably anticipate that they can complete the process of submitting their Joint Pre Trial Order, and other trial-related submissions in accordance with Your Honor's rules, within thirty (30) days of the Court's granting of this request.

This is the parties' first such request for an extension of time in this matter, and as stated above, all parties consent to this extension request.

If this request is granted, the parties can file their Joint Pre Trial Order, and other trial-related submissions by July 20, 2023 – short of this case settling sooner than that date.

We thank the Court for its kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

Avraham Y. Scher

Avraham Y. Scher, Esq.

Helen F. Dalton & Associates, P.C.

Attorneys for Plaintiffs

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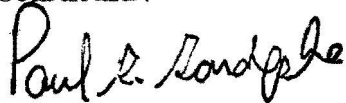
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MEMO ENDORSED:

The parties will file their joint pretrial order and other pretrial submission by **July 20, 2023**. If at any point the parties agree that a settlement conference before Judge Cave might be helpful, they will file a joint letter requesting a referral to Judge Cave for that purpose.

SO ORDERED.



Paul G. Gardephe

United States District Judge

Dated: June 21, 2023